

EXHIBIT 2

CONFIDENTIAL - ATTORNEYS' EYES ONLY
ERIC WELCH - 02/11/2019

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK
3
4 SIMO HOLDINGS, INC.,
5 Plaintiff,
6 vs. Case No. 18-cv-5427 (JSR)
7 HONG KONG UCLOUDLINK NETWORK
8 TECHNOLOGY LIMITED, AND
9 UCLOUDLINK (AMERICA), LTD.,
10
11 Defendants.
12 -----/
13
14

15 ** CONFIDENTIAL - ATTORNEYS' EYES ONLY **

16 VIDEOTAPED DEPOSITION OF ERIC WELCH

17 Monday, February 11, 2019
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23 Reported by:
24 LORRIE L. MARCHANT, RMR, CRR, CCRR, CRC
25 California CSR No. 10523

25 Job No. WDC-205961

1 BY MR. ZHU:

2 Q. You can take out your -- basically,
3 2 series exhibits. You can put them aside. Now
4 we're back to your report.

5 A. Okay.

6 Q. Your report, also Exhibit 1-A, which is
7 defendant's source code log.

8 A. M-hm.

9 Q. Can you take a look at defendant's source
10 code log.

11 A. M-hm.

12 Q. So does this look familiar to you?

13 A. It does. I can see that I signed it twice,
14 which corresponds to my memory.

15 Q. So you only reviewed the source code twice
16 at our Palo Alto office?

17 A. That's correct.

18 Q. That was, like, the first time -- when was
19 your first time to review the source -- review our
20 source code?

21 A. It looks like we were there on October 12
22 and then again on the 16th.

23 Q. So first day, on 12, it seems about 2.5
24 hours; right?

25 A. M-hm. Yeah. That's right.

1 Q. Your second time, about five hours?

2 A. Five hours, yes.

3 Q. So in total, less than eight hours;
4 correct?

5 A. Eight hours at the terminal in the Palo
6 Alto office. I spent -- after this, I spent, you
7 know, 100 plus hours with the source code.

8 Q. On the source code production?

9 A. Right. Right. What became clear early on
10 was there's a lot of it, and we needed to reorganize
11 the source code review project and find out best how
12 to -- how to go about doing this.

13 So we convened a team of people, and the
14 first stage was just, you know, finding out which
15 files had the appearance of being relevant, and then
16 we'd get those produced. And then the rest of us
17 would convene around those and do the real analysis.

18 So the time spent at the terminal by me and
19 everyone else here was just about finding things.
20 It wasn't really about doing the detailed analysis
21 that informed the report.

22 Q. So based -- based on this source code
23 review log, there's -- there's three columns. First
24 column is called "Name of person inspecting source
25 code."

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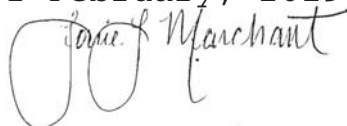
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1 REPORTER CERTIFICATE

2 I, LORRIE L. MARCHANT, Certified Shorthand
3 Reporter, Certificate No. 10523, for the State of
4 California, hereby certify that ERIC WELCH was by me
5 duly sworn/affirmed to testify to the truth, the
6 whole truth and nothing but the truth in the
7 within-entitled cause; that said deposition was
8 taken at the time and place herein named; that the
9 deposition is a true record of the witness's
10 testimony as reported to the best of my ability by
11 me, a duly certified shorthand reporter and a
12 disinterested person, and was thereafter transcribed
13 under my direction into typewriting by computer;
14 that request [] was [X] was not made to read and
15 correct said deposition.

16 I further certify that I am not interested
17 in the outcome of said action, nor connected with,
18 nor related to any of the parties in said action,
19 nor to their respective counsel.

20 IN WITNESS WHEREOF, I have hereunto set my
21 hand this 12th day of February, 2019.



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23
24 LORRIE L. MARCHANT, RMR, CRR, CCRR, CRC
Certified Shorthand Reporter #10523

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